

Reference 58


Texas Water Commission

INTEROFFICE MEMORANDUM

TO : Bill Brown, Field Operations Liaison, DATE: January 14, 1986
Hazardous and Solid Waste Division
THRU : Chip Volz, Manager, District 12
FROM : William F. Bowles, District 12
SUBJECT: Annual Solid Waste Compliance Inspection of
ARM Refining Company - Registration No. 31080

On December 5, 1985, I conducted an annual solid waste compliance inspection of the subject facility. This company does not operate as a refinery, which was their expected activity when they submitted their solid waste inventory. They are now in the waste oil reclamation business. Noncompliances noted during the inspection are Administrative Class II.

1. Notification of waste streams generated is not current. Violation of Texas Administrative Code (TAC) 335.6b.
2. Waste management methods in use do not agree with registration. Violation of TAC 335.6b.


William F. Bowles

WFB/af

Attachments

ADDITIONAL COMMENTS

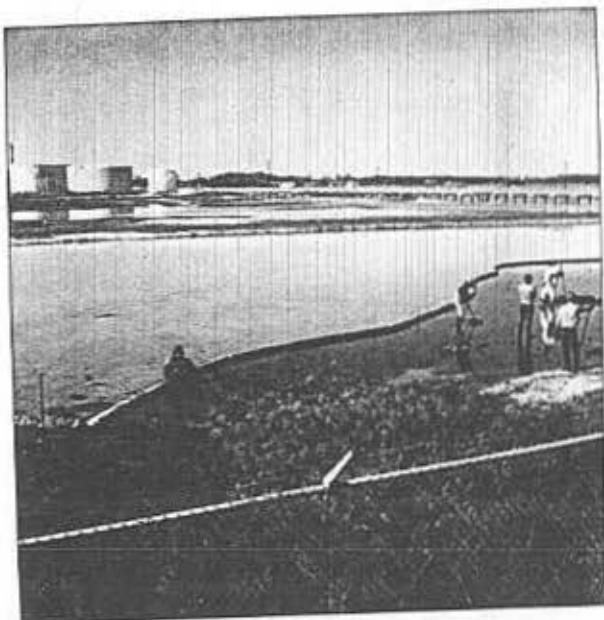
Item 1

ARM Refining Company initially began operation with the expectations of refining crude oil. This expectation failed to materialize. The company's operation now consists of reclaiming waste oil from drilling site pond skim and used lubrication oil from various sources. The company also uses their tank battery for temporary storage of product from other companies.

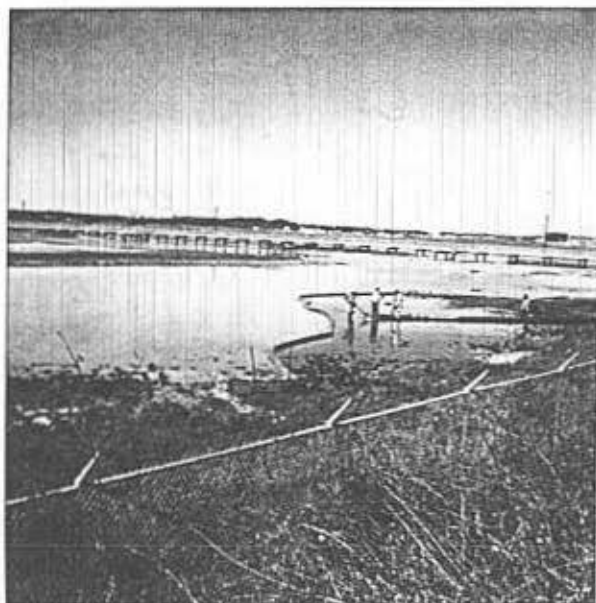
The waste streams generated consist of pond skim mud and debris sludge created during the separation stage of the recovery process. API separator sludge is listed only as IH when it is generated by the refining process. Subsequently, the Notice of Registration needs to reflect the company's actual status as a reclaimer and the waste streams generated by this activity. The oily mud generated is placed on the ground inside a tank containment area. No analysis of this material has been made.

Item 2

A follow-up inspection on December 11, 1985, that originated with a complaint, resulted in documenting an oil spill from an ARM pipeline which caused pollution to the surface waters of the State. The person in charge failed to notify the Texas Water Commission within the required 24 hours. This is a violation of the Texas Water Code Section 26.039. Investigation of this incident and clean-up is still in progress. Findings will be reported under separate cover.



ARM REFINING



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OIL SPILL 1/4/85



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